



## LEAGUE OF WOMEN VOTERS OF SAN DIEGO COUNTY

August 5, 2015 Statement by the League of Women Voters of San Diego County

To: San Diego County Planning Commissioners

Attention: Bryan Woods, Chair

Re: Lilac Hills Ranch (Item 2, August 7, 2015) – OPPOSITION

The League of Women Voters has commented throughout the evolution of the General Plan, supporting principles of compact growth, enforcement of fire-safe development, and identifying and safeguarding valuable agricultural land, a limited resource. We promote conservation and preservation of critical natural resources. Our Land Use position supports minimizing urban sprawl and maintaining established patterns of growth and community identity by allowing self-determination in community planning and decision making. We review major development projects with regional impacts, including environmental analysis, for consistency with comprehensive and regional infrastructure plans. Land use decisions should relate to and protect the overall quality of the environment while minimizing additional motor vehicle traffic.

The Lilac Hills Ranch proposed mixed-use residential and commercial land uses, consisting of 1,746 dwelling units on 608 acres, are not consistent with the existing General Plan Land Use Designations of Semi-Rural and Rural Residential. This project requires a General Plan Amendment and changes to the Valley Center and Bonsall Community Plans, which both Planning Groups voted against. This project also seeks to re-zone what is now predominantly agricultural land zoned as “Limited Agriculture” (A70). A Specific Plan and a Major Use Permit are also required and additional discretionary permits may be needed.

The County’s General Plan incorporates smart growth and land planning principles intended to reduce vehicle miles traveled, thus reducing greenhouse gases, by locating future development within and near existing infrastructure. The General Plan prohibits leapfrog development, except for new LEED Neighborhood Development (LEED-ND) certified Villages. A LEED-ND prerequisite stipulates development be sited in a *Smart Location* with existing infrastructure, nearby multimodal public transit, job availability and public services, thus, precluding this project, located 45 miles from San Diego.

As a LEED Accredited Professional, I am outraged that the County planners have attempted to bypass the LEED-ND standard with a so-called “equivalent” which is **NOT** equal. The first prerequisite for the planning-based LEED-ND is location. Since this project cannot meet that prerequisite, the developer has been allowed to substitute the construction-based National Green Building Standard (NGBS), which was developed by the building industry. No City or County in the State of California has adopted this standard. It is not equivalent to LEED-ND.

The County previously concluded that this project could result in adverse physical environmental effects due to growth inducement, potentially further impacting visual resources, air quality, biological resources, cultural resources, and noise. The application of a spurious standard, such as the NGBS, does not make this leap frog development acceptable.

The LWV expects transparency from our County planners and Commissioners. We believe that this project is not suitable for this location and urge you to adhere to the principles and guidelines of the General Plan. Please deny this project including the General Plan Amendment, re-zoning and the Community Plans changes. Thank you for your consideration. Sincerely,

Jösan Feathers, Registered Civil Engineer, LEED AP  
Natural Resources Director LWV San Diego County